UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,

Plaintiff;

v.

COMMONWEALTH OF PUERTO RICO, ET AL.,

Defendants.

No. 12-cv-2039 (GAG)

MOTION TO RESTRICT UNITED STATES' RESPONSE

COMES NOW, Plaintiff, the United States of America, by and through the undersigned counsel, and respectfully requests leave to file its Response to the Special Master's Motion in Compliance, ECF No. 1696, in restricted mode for viewing by counsel for the Parties and the Court, in compliance with Standing Order No. 9, *Amendment to the Restricted Filing and Viewing Levels Module*, Misc. No. 03-149 (Jan. 30, 2013). For cause, the United States alleges, states, and prays:

- The United States intends to file its Response to the Special Master's Motion in Compliance, ECF No. 1696, in accordance with the Court's Order of February 12, 2021, ECF No. 1697. The Special Master filed the Motion in Compliance in restricted mode.
- 2. Because the United States seeks to address matters raised by the Special Master in his restricted filing, the United States respectfully requests leave to file its response in restricted mode, until such time as the Court deems appropriate.

WHEREFORE, the United States respectfully requests leave to file its Response in restricted mode for viewing only by the Court and counsel for the Parties until further ordered by the Court.

WE HEREBY CERTIFY that on today's date, we filed the foregoing pleading electronically through the CM/ECF system, which caused the parties, counsel of record, and the Monitor on the service list to be served by electronic means.

Respectfully submitted, this 15th day of March, 2021,

STEVEN H. ROSENBAUM

Chief, Special Litigation Section Civil Rights Division

s/ Luis E. Saucedo

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